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YUKON TELEPHONE COMPANY, INC. P.O. BOX 873809 WASILLA, ALASKA 99687

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EXECUTE: IN CALLO

EX PARTE

September 17, 1997

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W. -- Room 222 Washington, D.C. 20554

RE: Ex Parte Notice -- CC Docket 96-45

Dear Mr. Caton:

On September 17, 1997, Paula Eller, representing Yukon Telephone Company, met with Ken Moran, Chief, Accounting and Audits Division, of the FCC's Common Carrier Bureau., to discuss positions taken by the Alaska Telephone Association in CC Docket No. 96-45, Federal-State Joint Board on Universal Service. The attachment was also used during the discussion.

An original and a copy of this *Ex parte* filing are being filed in the Secretary's office on September 17, 1997. Please include it in the public record of the proceeding.

Respectfully submitted,

aula E. Eller

Paula Eller President

cc: Ken Moran

attachment

No. of Copies rec'd O List ASCOE

Corporate Operations Expense Limitation

The FCC proposes limiting the amount of Corporate Operations Expense that may be recovered through Universal Service Funding by claiming that Corporate Operations Expense is largely discretionary. To the contrary, much of Corporate Operations Expense is required by State and Federal regulation (indeed, regulation promulgated by the FCC itself).

Executive

Formulating Corporate Policy Overall Administration & Management Board of Directors expenses

Planning

Long-Range Planning Options and Contingency Plans Economic strategic analysis

Finance

Financial accounting Regulatory accounting, including: Revenue requirements Jurisdictional separations Settlements/access pool reporting Associated cost accounting (cost of service, TELRIC, proxies) Payroll/disbursements Capital recovery Non-customer billing Audits (internal & external) Tax accounting and returns Continuing property records Financing Banking Cash management Benefit investment fund management (including actuarial services) Securities management Corporate financial planning and analysis Internal cashier services

External Relations

New service offerings
Rate Proceedings
Special Contracts
Obtaining FCC Radio Licenses
Obtaining Construction permits
Negotiating contracts
Administering investor relations

Human Resources

EEO and Affirmative Action Programs Maintaining employee records

General employment services
Occupational Medical Services
Job analysis and salary programs
Labor Relations activities
Personnel development/counseling
Personnel policy development
Benefit administration
Safety programs
Non-technical training

MIS

Data bases and applications systems for computers:
Planning
Development/programming
Testing
Implementing
Maintaining

Legal

Conducting litigation
Guidance on regulatory and labor matters
Preparing contracts
Interpreting legislation
Court costs
Filing fees
Depositions
Transcripts

Procurement/Purchasing

Purchasing materials and supplies Negotiating supply contracts Placing purchase orders Expediting and controlling orders Administering vendor claims

Other General and Administration

Maintaining archives
Security services
Cost of telecommunications services
Mail services
Payment of accident and damage claims
Insurance premiums
Accident and disability claims

Yukon Telephone Company Corporate Expense Analysis December 31, 1996

Labor Benefits		130,809.78 54,413.01
General Accounting:		
Donn's Debits & Credits	15,365.60	
GVNW	27,240.67	
Erickson & Brooks	4,095.00	46,701.27
General Office:		
Advertising	210.60	
Bank Fees	731.23	
Conference Fees	4,885.74	
Direct Marketing	3,060.00	
Directors Fees	20,000.04	
Equipment Repairs	4,145.05	
Gifts	598.50	
Insurance	16,472.33	
Legal Fees	590.55	
Membership Fees	3,360.64	
Office Supplies	3,802.02	
Postage	3,235.41	
Telephone	15,226.60	
Training Programs	79.00	
Travel (Exec. & Gen Off)	22,981.11	99,378.82
TOTAL CORPORATE EXPENSES		331,302.88

Increase in rate per line = \$7.65 per month, a 45% increase in residential rates.

Yukon Telephone serves 526 access lines in 3 exchanges, none of which are accessible by road.

FORM M SCHEDULE H INCOME STATEMENT ACCOUNTS

Yukon Telephone Co., Inc. (Company)

Year Ended December 31, 1996

PAGE 6 OF 8

REF.	ACCT.	ACCOUNT (a)	Salaries and Wages	Benefits	Rents	Other Expenses	Total
30.125.		Human Resources	\$4,386.34	\$1,474.29		\$46,701.27 (349.40)	52,561.90 (349.40) 0.00 0.00
	6724 6725 6726	Legal Procurement	1,024.38	752. 26		590.55	590.55 1,776.64 0.00
	6727 6728	Research and Development Other General and Administrative	38,201 48	16,192 90		73,776.41	128,170 79
	6720	Total General and Administrative Expense	\$43,612 .20	\$18,419.45	\$0.00	\$120,718.83	\$182,750.48
	6790	Provision for Uncollectible Notes Receivable					0 00
		Total Corporate Operations Expenses	\$130,809 78	\$54,413.01	\$0.00	\$146,080.09	\$331,302.88
		Total Operating Expenses	\$263,026 86	\$137, 539.43	\$4 6,634.79	\$351,566.23	\$798,757.31
		••					

BENEFITS 113957.00
Director Foes 4500.00
ADVER EXP 1131.99
<u>Dusuament</u> 53061.01
GENERAL OFFICE 35992,85
LEGAL 8810,00
GUNW 7/678.51
Assoc Dues 2241.00
AUDTORS 22454.00
Company Tou 15592.64
OTHER 2,237.00
TRAVEL 17.958.00
TOTAL 235657.00
TOTAL CORP \$ 567/65.00

MUKLUK TELEPHONE COMPANY 1996 G&A Cost Summary

Direct Labor:		
Executive	57,088. 64	
Accounting/Regulatory	107,013.63	
MIS	20,287.10	
Administrative	44,057.01	
Benefits:	,	
Executive	28.458.34	
Accounting/Regulatory	41,661.73	
MIS	6,728.00	
Administrative	23,313.00	
Legal Fees	45,424.39	Regulatory proceedings
Audit & Tax Services	16,744.43	
Benefit Fund Mgmt	22,691.89	Pension, profit-sharing
Regulatory Charges	29,190.56	Consulting and misc other reg-related costs
Travel Costs	27,377.69	Airfare, lodging, meals
Conferences & Dues	8,374.69	i.e., ATA annual conference
Training & Tuition	4,559.84	·
Phone Charges	49,439.11	
Insurance	22,156.37	Property, life, etc
Board Costs	8,060.80	• • • • • • • • • • • • • • • • • • • •
Office Costs	4,641.26	Office and janitorial supplies
Internal/External Relations	3,596.23	•
Freight & Postage	2,329.07	
MIS Charges	339.61	
Misc Other	41,804.61	
Total per Form M	615,338.00	

Total G&A disallowance per new rule = \$257,895 Reduction in 1998 USF due to disallowance = \$82,961

Increase in rate per line = \$6.69 per month, a 44% increase in residential rates

Mukluk serves 1,034 access lines in 12 exchanges, none of which are accessible by road. The service areas total 27,000 square miles. All calls between exchanges are long distance.

INTERIOR TELEPHONE COMPANY 1996 G&A Cost Summary

Direct Labor:		
Executive	181,575.78	
Accounting/Regulatory	282,650.00	
MIS	61,018.00	
Administrative	120,809.00	
Benefits:	·	
Executive	91,116.84	
Accounting/Regulatory	109,801.16	
MIS	20,554.00	
Administrative	66,551.00	
Legal Fees	183,130.86	Regulatory proceedings
Phone Charges	180,799,38	
MIS Charges	109,263.49	
Audit & Tax Services	35,474,82	
Benefit Fund Mgmt	69,264.77	Pension, profit-sharing
Travel Costs	105,436.80	Airfare, lodging, meals
Conferences & Dues	19,892.01	i.e., ATA annual conference
Training & Tuition	15,284.31	
Insurance	67,630.15	Property, life, etc
Regulatory Charges	44,308,45	Consulting and misc other reg-related costs
Board Costs	24,604.80	
Office Costs	14,080.52	Office and janitorial supplies
Internal/External Relations	13,688.58	•
Freight & Postage	7,840.66	
Misc Other	98,988.65	
Total per Form M	1,923.762.00	

Total G&A disallowance per new rule = \$784,648
Reduction in 1998 USF due to disallowance = \$235,729

Increase in rate per line = \$4.25 per month, a 21.41% increase in residential rates

Interior serves 4,614 access lines in 9 exchanges, only one of which is accessible by road. The service areas total 4,500 square miles. All calls between exchanges are long distance.

9710 Total 1778 Tetal

Grand Total Executive and Planning - Beard of Directors and Strategic Planning Corporate Operations - Other General & Administrative Costs Total Corporate Operations Expanse

Audio 18 5,860,821.91 6,186,739.29 328,116.36

N: Wacess\\1997\Financ\\W\th.xds \[Corp. Exp. Summary (2)\]

Arctic Slepe Telephone Association Cooperative, Inc.

General and Administrative Costs Prepared By: Brends Shepard Dete: September 14, 1997

Period Ending: December 31, 1996

Labor & Benefits	641,187
Travel	133,981
Continuing Education	12,495
Software & Training	24,837
Phone Charges	76,628
Postage	11,696
Office Supplies	14,371
Corporate Insurance	19,542
Association Dues	12,141
Community Support	16,100
Regulatory Fees	2,000
Miscellaneous	36,667
Annual Meetings	39,491
Coat Study &	·
Regulatory Filings	84,758
Audits	39,300
Legal Counsel	49,600

Notes: 60% of Travel costs are Board of Director Meetings and workshops. The Board must be keep up to date on industry issues because they have a fiduciary responsibility. Travel costs in our area is high due to the lack of roads, all Board Members must be flown in to a central location. All communications are over the toll network and mail must be first class.

Service area coverage 92,000 square miles. 8 exchanges, access lines 2,169

Impact of USF corporate limitation is a reduction of support of 66,000.

Total Corporate Operations Expense	Insurance	Dues & Subscriptions	Annual Mosting Required by Law	Advertising	Public Relations	Executive & Planning	Certifiact Services	Direct Benefit Payments to Retirees	Regulatory Filings / Rate Design	Financial Accounting	Equat Accume	Training	Computer Information Services	Human Recurre	Purchasing	Supplies	Mei Rean/Portige	Corporate telepone expense	
6,186,738.29	197,538.63	01,961,78	108,348,10	91,985.62	45,380.38	255,005.31	286,201.00	13,000.92	685,252.71	1,988,345.84	8,010.95	471,715.78	855,279.28	470,850,68	351,291.98	255,472.00	140,140,78	125,749.70	